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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JARED J. KYNASTON,

15 Defendant.

12-CR-00016-WFN-1

Motion for Detention Hearing

16 The United States moves for pretrial detention of Defendant, pursuant to
17 18 U.S.C. § 3142(e) and (f).

18 1. Eligibility of Case. This case is eligible for a detention order
19 because the case involves:

- 20 ☐ Crime of violence (as defined in 18 U.S.C. § 3156(a)(4) which
21 includes any felony under Chapter 109A, 110 and 117),
22 ☐ Maximum penalty of life imprisonment or death,
23 ☒ Drug offense with maximum penalty of 10 years or more,
24 ☐ Felony, with two prior convictions in above categories,
25 ☐ Felony that involves a minor victim or that involves the
26 possession or use of a firearm or destructive device (as those
27 terms are defined in section 921), or any other dangerous
28 weapon, or involves a failure to register under 18 U.S.C.
section 2250,
☒ Serious risk Defendant will flee, or
☐ Serious risk obstruction of justice.

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- 1 2. Reason For Detention. The Court should detain Defendant because
2 there is no condition or combination of conditions which will
3 reasonably assure:
4 ☒ Defendant's appearance as required, or
5 ☒ Safety of any other person and the community.
6 3. Rebuttable Presumption. The United States will invoke the
7 rebuttable presumption against Defendant under Section 3142(e).
8 The presumption applies because there is probable cause to believe
9 Defendant committed:
10 ☒ Drug offense with maximum penalty of 10 years or more,
11 ☐ 18 U.S.C. § 924(c) firearms offense, or
12 ☐ Kidnaping, sexual crimes, or child pornography offenses.
13 4. Time For Detention Hearing. The United States requests the Court
14 conduct the detention hearing:
15 ☐ At the first appearance, or
16 ☒ After a continuance of three days.
17 5. Other Matters.
18 ☐

19 DATED February 10, 2012.

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21 Michael C. Ormsby
 United States Attorney

22 *s/Russell E. Smoot*

23 Russell E. Smoot
24 Assistant United States Attorney
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1 I hereby certify that on February 10, 2012, I electronically filed the
2 foregoing with the Clerk of the Court using the CM/ECF System.

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4 *s/Russell E. Smoot*

5 Russell E. Smoot
6 Assistant United States Attorney
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